

1 Milton L. Chappell, Esq. (*pro hac vice*)
2 c/o National Right to Work Legal
3 Defense Foundation, Inc.
4 8001 Braddock Road, Suite 600
5 Springfield, Virginia 22160
6 Phone: (703) 770-3329
7 Fax: (703) 321-9319
8 Email: mlc@nrtw.org
9 *Counsel for Service*

6 Steven R. Burlingham, Esq. (CBN 88544)
7 GARY, TILL & BURLINGHAM
8 5330 Madison Avenue, Suite F
9 Sacramento, California 95841
10 Phone: (916) 332-8122
11 Fax: (916) 332-8153
12 Email: steveb@gtblaw.com

10 *Attorneys for Plaintiffs and the Class*

13 UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 DAVID M. FRIEDMAN *et al.*,
17 On behalf of all others similarly situated,
18 *Plaintiffs,*
19 v.
20 CALIFORNIA STATE EMPLOYEES
21 ASSOCIATION *et al.*,
22 *Defendants.*

Case No. CIV-S-00-00101 WBS/DAD

CLASS ACTION

STIPULATION AND ORDER
SUBMITTING THE MOTION FOR
APPROVAL OF CLASS NOTICE OF
PLAINTIFFS' MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS AND
EXPENSES ON THE RECORD

HEARING DATE: April 26, 2010

TIME: 2:00 p.m.

Courtroom of Judge William B. Shubb,
Courtroom 5, 14th Floor, Sacramento, CA

26 Pursuant to L.R. 143 and 230(g), Plaintiffs David M. Friedman *et al.*, and Defendant
27 California State University Employees Union, SEIU Local 2579, California State Employees
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Association,¹ and Defendant State Controller John Chiang,² by and through their undersigned counsel, hereby respectfully submit the following Stipulation Submitting the Motion for Approval of Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses on the Record and Briefs on File:

1. On March 24, 2010, Plaintiffs filed their Motion for Approval of Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses (Doc. No. 278) and related papers (Doc. Nos. 279-280).

2. Both Defendants filed Statements of Non-Opposition to Plaintiffs' Motion for Approval of Class Notice (Doc. Nos. 284 & 285).

3. Counsel for Plaintiffs and Defendants wish to submit the Motion for Approval of Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses on the record and without oral argument.³

DATED: April 16, 2010

Respectfully submitted,



Milton L. Chappell, Esq. (*Pro hac vice*)
c/o National Right to Work Legal
Defense Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, Virginia 22160
Phone: (703) 770-3329
Fax: (703) 321-9319
Email: mlc@nrtw.org

¹This is the current correct name of the defendant initially sued as "Defendant California State Employees Association, Local 1000, Service Employees International Union, AFL-CIO, CLC."

²Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, State Controller John Chiang is automatically substituted as a defendant in this matter in place of his predecessor and original defendant, Kathleen Connell.

³If the Court has any questions for counsel or wishes to proceed with oral argument, all counsel request that they be permitted to attend the hearing by telephone: Milton L. Chappell at (301) 770-3329; Jeffrey B. Demain at (415) 421-7151; Douglas J. Woods at (916) 324-4663.

Steven R. Burlingham, Esq. (State Bar No. 88544)
GARY, TILL & BURLINGHAM
5330 Madison Avenue, Suite F
Sacramento, California 95841
Phone: (916) 332-8122
Fax: (916) 332-8153
Email: steveb@gtblaw.com
Attorneys for Plaintiffs and the Class

IT IS SO STIPULATED.

Dated: April 16, 2010

/s/ Jeffrey B. Demain (as authorized on April 12, 2010)

Nancy T. Yamada (State Bar No. 155155)
California State University Employees Union
SEIU Local 2579, California State Employees Association
1108 O Street, 5th Floor
Sacramento, California 95814
Phone: (916) 319-4800
Fax: (916) 319-4808
Email: Nyamada@calcsea.org

Jeffrey B. Demain (State Bar No. 126715)
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, California 94108
Phone: (415) 421-7151
Fax: (415) 362-8064
Email: jdemain@altshulerberzon.com

*Attorneys for Defendant California State University
Employees Union, SEIU Local 2579, California State
Employees Association*

Dated: April 16, 2010

Edmund G. Brown, Jr.
Attorney General of California


/s/ Douglas J. Woods (as authorized on April 13, 2010)

Douglas J. Woods
Supervising Deputy Attorney General
1300 "I" Street, Suite 125
Sacramento, CA 95814
Phone: (916) 324-4663
Fax: (916) 324-8835
Email: Douglas.Woods@doj.ca.gov

*Attorneys for Defendant John Chiang,
Controller of the State of California*

1 **IT IS SO ORDERED.**

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4 Dated: April 16, 2010

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6 WILLIAM B. SHUBB
7 UNITED STATES DISTRICT JUDGE
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PROOF OF SERVICE

I hereby certify, under penalty of perjury, that a true and correct copy of this Stipulation and Order Submitting Motion to Enter Judgment was deposited in the United States Mail, first-class postage pre-paid, addressed to:

Nancy T. Yamada
Cal State University Employees Union, SEIU Local 2579
California State Employees Association
1108 "O" Street, 5th Floor
Sacramento, CA 95814
*Attorney for Defendant California State University Employees Union, SEIU Local 2579,
California State Employees Association*

I further certify, under penalty of perjury, that I electronically filed with the Clerk of the Court the foregoing Stipulation and Order Submitting Motion to Enter Judgment, using the CM/ECF system which will send notification of such filing to

Jeffrey B. Demain
*Attorney for Defendant California State University Employees Union, SEIU Local 2579,
California State Employees Association*

Douglas J. Woods
Attorney for Defendant John Chiang, Controller of the State of California

All of these actions were taken on the 16th day of April, 2010.


Milton L. Chappell, Esq. (*pro hac vice*)